

FILED

MAR - 5 2025
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSE HERNANDEZ-ESPITIA,
a/k/a Jose Hernandez-Espita
a/k/a Alex Hernandez
Defendant.

)
)
)
)
) Case No.

4:25-CR-99-JAR/SRW

INDICTMENT

COUNT I

The Grand Jury charges that:

Beginning at a time unknown but including June 2024 through August 2024, and
continuing up to the date of indictment, in the Eastern District of Missouri,

JOSE HERNANDEZ-ESPITIA

the defendant herein, did knowingly combine, conspire, agree, and confederate together with
other persons known and unknown to the Grand Jury, to distribute and possess with the intent to
distribute cocaine, a Schedule II controlled substance, in violation of Title 21, United States
Code, Section 841(a)(1), all in violation of Title 21, United States Code, Section 846.

COUNT II

The Grand Jury further charges that:

On or about July 21, 2024, in the City of St. Louis in the Eastern District of Missouri,

JOSE HERNANDEZ-ESPITIA

the defendant herein, did knowingly distribute cocaine, a Schedule II controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

COUNT III

The Grand Jury further charges that:

On or about August 11, 2024, in the City of St. Louis in the Eastern District of Missouri,

JOSE HERNANDEZ-ESPITIA

the defendant herein, did knowingly distribute cocaine, a Schedule II controlled substance in violation of Title 21, United States Code, Section 841(a)(1).

COUNT IV

The Grand Jury further charges that:

On or about February 27, 2025, in the City of St. Louis in the Eastern District of Missouri,

JOSE HERNANDEZ-ESPITIA

an alien, was found in the United States after having been removed therefrom to Mexico, without having obtained the express consent of the Attorney General of the United States or the Secretary of Homeland Security to reapply for admission to the United States, in violation of Title 8, United States Code, Section 1326(a).

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 21, United States Code, Sections 853, upon conviction of an offense in violation of Title 21, United States Code, Sections 846 or 841(a)(1), as set forth in Counts I, II, and III the Defendant shall forfeit to the United States of America any property constituting or derived from any proceeds obtained, directly or indirectly, as a result of the offense; and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the offense.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to the offenses charged in Counts I, II, and III.

3. If any of the property described above, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

PAUL REBAR, #69289MO
Special Assistant United States Attorney